

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AMYRIS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

Re: Docket No. 508

**DEBTORS' RESPONSE TO THE AD HOC NOTHEOLDER GROUP'S LIMITED
OBJECTION TO THE DEBTORS PROPOSED FORM OF FINAL DIP ORDER**

The above-captioned debtors and debtors in possession (the "Debtors") file this response (the "Response") to the *Ad Hoc Noteholder Group's Limited Objection to the Debtors' Proposed Form of Final DIP Order* [Docket No. 508] (the "Limited Objection")² and, in support thereof, respectfully state as follows:

I.

RESPONSE TO LIMITED OBJECTION

The Debtors join in the *Reply of Euagore, LLC and the Foris Prepetition Secured Lenders to the Ad Hoc Noteholder Group's Limited Objection to the Debtors' Proposed Form of Final DIP Order* (the "Lenders' Reply"). As is set forth more fully in the Lenders' Reply, the Debtors and the Foris Prepetition Secured Lenders have agreed to extend the Challenge Period under the proposed form of Final DIP Order for the Committee, the party that is a fiduciary to the all creditors and is leading the charge on the creditors' investigation of any claims that may exist against the

¹ A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.stretto.com/Amyris>. The location of Debtor Amyris Inc.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

² Capitalized terms not otherwise defined have the meanings set forth in the Limited Objection.

Foris Prepetition Lenders. For the reasons set forth therein, the extension of the Challenge Period for the Committee is entirely appropriate and there is no basis to require that the Challenge Period be extended for parties other than the Committee. The Committee is undertaking an extensive investigation and the Debtors are and will continue to cooperate with that investigation. The Proposed Final Order should be entered as soon as possible and without modification, so that the Debtors can continue to operate their businesses while they reorganize.

II.

CONCLUSION

The Debtors respectfully request that the Limited Objection be overruled and the Proposed Final DIP Order (Exhibit A to Docket No. 508) be entered, without modification.

Dated: October 16, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

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